

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

TRIDENTIS, LLC,

Plaintiff,

v.

Case No. 1:23-cv-97

CITY OF ALEXANDRIA,

Defendant.

JOINT STIPULATION REGARDING SCHEDULING

Tridentis has filed a complaint and an emergency motion for temporary restraining order and preliminary injunction. The preliminary injunction would enjoin Alexandria’s BIPOC Small Business Grant Program. To ensure that the Court had time to consider that request, Tridentis also sought a TRO that would, for example, bar the application window from opening until the preliminary-injunction motion is decided. The parties have now met and conferred and stipulate to the following:

1. Alexandria has postponed the launch of the BIPOC Small Business Grant Program (*See* Docket No. 10 “Notice Regarding Plaintiff’s Request for TRO”).

2. Tridentis thus withdraws its request for an emergency temporary restraining order. If the City of Alexandria’s decision to postpone the launch of the BIPOC Small Business Grant Program changes, it will give at least 14 days’ advance notice to Plaintiff such that Plaintiff will have sufficient time to refile its TRO and the Court can issue a decision.

3. The parties will move forward on Tridentis’s motion for a preliminary injunction.

4. The City of Alexandria is presently evaluating the merits of Plaintiff’s Complaint as well as its possible defenses thereto. The City’s opposition to the motion for preliminary injunction is currently due February 6 under the Court’s rules. *See* Local Rule 7(F)(1). The parties may meet and confer and submit a different proposed briefing schedule for the motion.

5. In the interest of efficiency, the parties further ask that Alexandria's deadline to respond to Plaintiff's complaint be stayed until after Tridentis's preliminary-injunction motion, including any related appeal, is resolved.

Dated: January 24, 2023

Respectfully submitted,

/s/ Travis S. MacRae

Travis S. MacRae (VA Bar No. 78771)
Senior Assistant City Attorney
301 King Street, Suite 1300
Alexandria, Virginia 22314
Office – 703-746-3750
Travis.MacRae@alexandriava.gov

Counsel for Defendant

/s/ Bryan Weir

Bryan Weir (VA Bar No. 82787)
CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd., Ste. 700
Arlington, VA 22209
(703) 243-9423
bryan@consovoymccarthy.com

Counsel for Plaintiff